

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

JOHN BARNHARDT, *et al.*,

Plaintiffs,

and

UNITED STATES OF AMERICA,

Plaintiff-Intervenor,

v.

MERIDIAN MUNICIPAL SEPARATE
SCHOOL DISTRICT, *et al.*,

Defendants.

Civil Action No. 4:65-cv-01300-HTW-LRA
1300(E)

PLAINTIFFS' MOTION FOR PROTECTIVE ORDER

Private Plaintiffs ("Plaintiffs") move the Court for a protective order to protect the confidentiality of documents that the Meridian Public School District ("District") was ordered to produce on December 19, 2018.

1. By Order on December 19, 2018, this Court granted Plaintiffs' motion to compel discovery, ordering the District to produce copies of documents responsive to Plaintiffs' October 1, 2018 Request for Production No. 21 ("Responsive Documents"), subject to a protective order.
2. Plaintiffs and the District have agreed upon a joint protective order, attached as Exhibit A.
3. As described in the joint protective order, Responsive Documents are designated "confidential." The Responsive Documents should be kept confidential, secure, and used solely for the purposes of this litigation and for no other purpose. Such confidential

information shall be made available only to “Qualified Persons” and used and protected as provided in the joint proposed Protective Order.

4. Plaintiffs and Defendants have been able to complete this while proceedings are stayed, *See* Text Order entered December 27, 2018, as it concerned the District and Private Plaintiffs.

Respectfully submitted this 23rd day of January, 2019.

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Counsel for Private Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of January 2019, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which sent notification of such filing to all counsel of record.

/s/ Kristen A. Johnson

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